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March 11, 2003

VIA ELECTRONIC SUBMISSION

William Maher
Chief of the Wireline Competition Bureau
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

Re: Follow-up to *Ex Parte* Meeting by Core Communications, Inc.
WC Docket No. 02-384

Dear Mr. Maher:

This letter serves as a follow-up to our March 5, 2003 *ex parte* meeting with Core Communications, Inc. ("Core") regarding Verizon's pending 271 Application for Maryland. During our meeting, you and members of your team, raised questions regarding Core's position that Verizon's failure to provide Core with Automatic Number Identification ("ANI") for local calls over multi-frequency ("MF") trunks demonstrates that Verizon has not met its statutory obligation for compliance with section 271 Checklist Item (i).[1] In particular, members of your team indicated that the Commission, specifically the Office of Engineering and Technology, has been presented with support for Verizon's position that it is technically infeasible to provide ANI over MF trunks.

[1] Checklist Item (i) requires that the BOC provide interconnection in accordance with sections 251(c)(2) and 251(d)(2), 47 U.S.C. § 271(c)(2)(B)(i). According to the Commission, in order for a BOC to meet its statutory obligation for compliance with a 271 Checklist Item, it must show that it has a "concrete and specific legal obligation to provide the item requested" and is "currently furnishing, or is ready to furnish, the checklist items in quantities that competitors may reasonably demand and at an acceptable level of quality." *See Application by Qwest Communications International, Inc. for Authorization to Provide In-Region, InterLATA Services in the State of Colorado, Idaho, Iowa, Montana, Nebraska, North Dakota, Utah, Washington and Wyoming*, Memorandum Opinion and Order, 17 FCC Rcd 26303, Appendix K-3 (Dec. 23, 2002).

As demonstrated by the attached declarations of two independent network engineers, Mr. Lawrence J. Chu (a long time New York Telephone employee) and Mr. Robert A. Hart, provisioning ANI over MF local interconnection trunks is technically feasible. In fact, Verizon has provisioned MF trunks utilizing the equal access signaling protocol, which includes ANI, for local interconnection. We hope that inclusion into the record of the attached declarations will assist the Commission in recognizing that Verizon's repeated contention that providing ANI over MF trunks is technically infeasible is incorrect; and furthermore, that Verizon's continued failure to provide such interconnection features to Core demonstrates that Verizon is not in compliance with section 271 Checklist Item (i). Both Mr. Chu and Mr. Hart are available to discuss the technical feasibility of providing ANI over MF local interconnection trunks with your team as necessary to resolve this issue.

In accordance with the Commission's rules, this letter and attachments are being filed electronically for inclusion in the public record in the above-referenced proceeding. Copies of this submission are being provided to the attendees from the Wireline Competition Bureau and Verizon. If you have any questions regarding this matter, please contact myself at (703) 918-2300 or Heather Hendrickson at (202) 887-1284.

Respectfully Submitted,

Michael B. Hazzard
Heather Hendrickson

Enclosures

cc: Matthew Brill
Jordan Goldstein
Daniel Gonzalez
Christopher Libertelli
Lisa Zaina
Marlene Dortch
Scott Bergmann
Jeff Carlisle
Ben Childers
Gail Cohen
Greg Cooke
Rich Lerner
Clint Odom
Jim Pachulski
Karen Zacharia

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of	)	
	)	
Application by Verizon Maryland Inc., Verizon Washington, D.C. Inc., Verizon West Virginia Inc., Bell Atlantic Communications, Inc. (d/b/a Verizon Long Distance), NYNEX Long Distance Company (d/b/a Verizon Enterprise Solutions), Verizon Global Networks Inc., and Verizon Select Services Inc., for Authorization To Provide In-Region, InterLATA Services in Maryland, Washington, D.C., and West Virginia	)	WC Docket No. 02-384

DECLARATION OF LAWRENCE J. CHU
ON BEHALF OF CORE COMMUNICATIONS, INC.

I. INTRODUCTION

1. My name is Lawrence J. Chu. My qualifications are set forth below.

2. My career spans over thirty (30) years in the telecommunications industry. I am currently with the Mediacom Consulting Group, L.L.C. located at 666 Third Avenue, New York, New York 10017. I currently provide consulting support to new entrant local exchange carriers in all aspects of telecommunications. I also perform research for Nippon Telephone and Telegraph on a variety of telecommunications issues.

3. Prior experience has included assignments in New York Telephone, AT&T, NYNEX/Bell Atlantic and Bell Communications Research. Throughout my career with these companies, I have held positions of assistant engineer, engineer, and supervising engineer in various engineering and network assignments in local telephone operations, including switching administration, electronic switching

systems administration and translations, special services, operations planning, central office design and equipment engineering. My other professional assignments include: leading the Bell Atlantic witness team in a New York proceeding on reciprocal compensation and Internet calls; leading the Bell Atlantic team that developed all wholesale tariffs in compliance with the Competitive Checklist for New York; developing NYNEX's Statement of Generally Available Terms and Conditions; negotiator for interconnection agreements under the Telecommunications Act of 1996, completing ten agreements; planning and negotiating the first competitive interconnection agreements for local exchange competition in the country; consulting at Bellcore with various Bell companies on access market and new business opportunity issues; developing the NYNEX Open Network Architecture ("ONA") Plan; providing technical regulatory support during divestiture for the development of the access tariffs. I hold a Bachelor of Science degree in Electrical Engineering from Polytechnic Institute of Brooklyn.

II. VERIZON'S ASSERTION THAT IT IS TECHNICALLY INFEASIBLE TO PASS ANI ON LOCAL CALLS OVER MF TRUNKS IS INCORRECT

4. The purpose of my Declaration is to respond to Verizon's statement in the Reply Declaration of Paul A. Lacouture and Virginia R. Rusterholz Regarding Maryland and the District of Columbia and West Virginia that Verizon's switches cannot pass ANI information over MF trunks used for local interconnection. Paragraph 143 of this Reply Declaration states:

> Core also claims that Verizon has a "policy" not to pass Automatic Number Identification ("ANI") information over Multi-Frequency

("MF") trunks to CLECs. This is not a matter of policy, but rather a technical reality. Verizon's switches cannot pass ANI information on local calls over MF trunks. Verizon switches can only pass ANI information on interexchange (long distance) calls. Contrary to Core's assertions, Verizon does not, and cannot, pass ANI information on local calls over MF trunks to CLECs that provide long distance service.

5. In my experience in negotiating and implementing interconnection agreements, Verizon can and has provisioned MF trunks utilizing the equal access signaling protocol (which includes ANI) for local interconnection so that Verizon and the CLEC could provide the same features to the CLEC's end users that Verizon provides to its end users. There is no issue of "technical feasibility" in provisioning this basic functionality.

6. The implementation of these MF trunks utilizing the equal access signaling protocol for local interconnection was not difficult. The CLEC obtained a Carrier Identification Code, which enable the switch translations in the Verizon switches to deliver calls to the MF trunks with the equal access signaling protocol. There was no need for any assistance from the various switch vendors to implement these trunks.

7. If these MF trunks utilizing equal access signaling were not deployed, end users switching from Verizon to the CLEC would lose features that depend on the delivery of ANI. The most popular feature that would not work would be the caller identification feature. Without ANI, a CLEC end user would not receive

any caller number identification on calls from Verizon end users. Similarly, calls from a CLEC end user to a Verizon end user would also not provide caller identification. To meet the goal of the Telecommunications Act that customers be able to switch local exchange carriers transparently, the MF trunk with equal access signaling provided such transparency.

8. Another requirement that MF trunks utilize the equal access signaling protocol is that both Verizon and the CLEC need to create billing records on terminating calls in order to bill reciprocal compensation. The MF trunk utilizing the equal access signaling protocol provides terminating recording. The MF trunk that Verizon used for local calling did not have the capability to record incoming calls. The MF trunk utilizing the equal access signaling protocol provided this capability as well.
9. The implementation of the MF trunks utilizing the equal access signaling protocol is compatible with the Signaling System 7 ("SS7") technology. Calls can be routed throughout the Verizon network via SS7 and need only be converted to MF trunks utilizing equal access signaling protocol in the switch that interconnects with the CLEC. For new entrants this is usually at the Verizon tandem.
10. The Verizon position is carefully stated as to exclude MF trunks that utilize the equal access signaling protocol from it discussion. While the equal access signaling protocol feature was developed for interconnection with interexchange carriers, the protocol can be used in other applications, including local interconnection. In some other Verizon states, the MF trunks that utilize the equal access signaling protocol for local interconnection are able to deliver exchange

access traffic as well. The delivery of ANI enables Verizon and the CLEC to separate local traffic from toll and access traffic and to bill the proper tariffed rate for all three types of traffic over the same MF trunk group.

11. The Verizon position is not compatible with how local interconnection was implemented to meet the Telecommunications Act. MF interconnection without the capabilities provided by the equal access signaling protocol would limit the ability of the CLEC to compete effectively and to bill for reciprocal compensation, or otherwise rate calls for billing purposes.

12. Verizon also states that CPN is not ANI and that CPN is part of the SS7 standards and is only used with SS7 trunks on both local and long distance calls. Verizon may be technically correct but in practical applications, ANI has been used to provide caller identification services before conversions to SS7 for interconnection with interexchange carriers became available. As a new entrant, Core Communications will use ANI in lieu of CPN until it can upgrade its network.

13. Finally, Verizon ignores its own Statement of Generally Available Terms and Conditions (SGAT). Section 3.0 of the Verizon Maryland SGAT states in Footnote 1 that "Initial implementation will be multi-frequency pending SS7 certification is achieved." While the grammar of the footnote is questionable, the intent is clear that Verizon is still requiring possible MF trunk implementation. What type of MF trunk would Verizon implement that enables the billing and recording of terminating usage and that provides the ANI to enable end user features to operate? The MF trunk that Verizon appears to offer in this

proceeding without ANI and possibly terminating recording will not provide the necessary functionality to conform to the goals and requirements of the Telecommunications Act.

14. In my experience, the MF trunk utilizing equal access signaling protocol (which includes ANI) has been the only MF trunk type that provides feature transparency to the end user and billing information necessary for reciprocal compensation billing. Verizon can and has passed ANI of MF trunks used for local interconnection.

III. CONCLUSION

15. As I demonstrated above, it is technically feasible to provide ANI over MF trunks. Verizon can and has provisioned MF trunks utilizing the equal access signaling protocol (which includes ANI) for local interconnection.

16. This concludes my declaration.

I declare under the laws of the United States that the statements presented herein are true and correct.

Executed on March 11, 2003

Lawrence J. Chu

SECTION 3.0 Sheet 1

INITIAL NETWORK IMPLEMENTATION SCHEDULE FOR MARYLAND

In accordance with the provisions of Section 3 of the Agreement, the Companies shall make their best efforts to meet the following initial Milestones no later than the listed Dates.

LATA in Maryland	Milestone	Date
LATA ___	LATA Start Date	
	SS7 Certification, Collocation, Operator Services/DA Facilities, and NXX(s) Applied For	
	Companies Agree on Trunking Arrangements and IPs for Traffic Exchange	
	Valid Access Service Request(s) ("ASRs") for Traffic Exchange Trunk Groups and Routing Information Received by BA	
	Valid Orders for 911 Facilities Received by BA	
	All Trunks (Traffic Exchange, Operator Services/DA, 911) Tested and Turned Up	
	Arrangements for Alternate-Billed Calls Agreed Upon	
	Call-through Testing Completed; "Interconnection Activation Date"	

Failure of a Party or the Parties to meet an earlier Milestone Date shall not relieve either Company of the responsibility to make its best efforts to meet subsequent Milestone Date(s) in the LATA, unless, and only to the extent that, the subsequent Milestone Date(s) depend on the timely completion of such earlier Milestone Date.

[1] SS7 certification scheduling depends on actual schedule availability at time of request. Initial implementation will be multi-frequency pending SS7 certification is achieved.

[2] Intervals for IDLC collocation arrangements for VG ULL capability are 60 days for Virtual Collocation and 120 days for Physical Collocation from the date the arrangement is applied for.

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of	)	
	)	
Application by Verizon Maryland Inc., Verizon Washington, D.C. Inc., Verizon West Virginia Inc., Bell Atlantic Communications, Inc. (d/b/a Verizon Long Distance), NYNEX Long Distance Company (d/b/a Verizon Enterprise Solutions), Verizon Global Networks Inc., and Verizon Select Services Inc., for Authorization To Provide In-Region, InterLATA Services in Maryland, Washington, D.C., and West Virginia	)	WC Docket No. 02-384

DECLARATION OF ROBERT A. HART IV, P.E.
ON BEHALF OF CORE COMMUNICATIONS, INC.

I. INTRODUCTION AND SUMMARY

1. My name Robert A. (Drew) Hart. I am a registered professional engineer in electrical engineering, and I presently work as CCG Consulting, Inc. in Baton Rouge, Louisiana. I have over 30 years practice of communications engineering and co-founding communications ventures. I have provided engineering consulting services to communications providers of all types, including BellSouth, various rural incumbent local exchange carriers, and a variety of wireless companies. I am a 1970 graduate of Louisiana State University with a Bachelor of Science Degree in Electrical Engineering.

2. The purpose of this declaration is to demonstrate that it is technically feasible to pass Automatic Number Identification ("ANI") over Multi-Frequency ("MF") trunks used for local interconnection.

3. Based on my review of the Reply Declaration of Paul A. Lacouture and Virginia R. Rusterholz, Verizon appears to be claiming it cannot provide ANI in a "local – 10 digit" situation. This position is simply incorrect. ANI can be passed over MF trunks used for local service just as it can be passed over MF trunks used for long distance service, and other services like 911 and Operator Services.

II. BACKGROUND

4. Before divestiture in 1984 most signaling between switching systems was MF signaling. The "called number" was always included in signaling or no calls could be completed by the interconnecting system. Many times the ANI ("calling number") was sent in addition to the "called number." These situations where the "calling number" or ANI was sent usually involved situations where the handling of the call "up-stream" needed to "know" who is placing the call or for billing purposes.

5. After divestiture, Feature Group D ("FGD") was established primarily to enable "equal access" to long distance, interexchange carriers ("IXCs"). In FGD, ANI is sent first to the upstream switching system so that the IXC trunk group could be identified from a presubscription database. Then the called party information would be transmitted after a "wink signal." This was a significant change in signaling in all RBOC central offices, and was implemented across the entire network during the mid to late 1980s. FGD was by no means the first situation in which ANI was passed between carriers. Indeed, ANI was passed over MF trunks for substantially more than a decade before divestiture.

6. From an engineering standpoint, signaling and associated protocol are completely separate from the name a product is given in a tariffed product. For example FGD is a tariffed product that can be provisioned to IXCs over MF trunks. From an engineering perspective, whether the carrier is providing local service, IXC service, or some other type of service is irrelevant to the underlying capabilities of MF trunks. For purposes of this declaration, the fundamental point is that it is technically feasible to pass ANI over MF trunks (local or IXC) – the technology simply does not depend on the regulatory classification of the traffic (*e.g.*, local or long distance).

III. IT IS TECHNICALLY FEASIBLE TO PASS ANI OVER MF LOCAL INTERCONNECTION TRUNKS

7. There can be simply no doubt that it is technically feasible to pass ANI over MF trunks, regardless of whether the trunks are "local" or "long distance." ANI can be passed over MF trunks used for local service just as it can be passed over MF trunks used for long distance service, and other services like 911 and Operator Services.

8. Since 1984, the RBOCs have implemented equal access (which requires ANI to be forwarded even in an MF environment), SS7, E911, etc. There is no technical reason that Verizon could not simply add a local exchange carrier's name to Verizon's presubscribed database and provide ANI over MF local interconnection trunks.

9. From a technical standpoint, passing ANI over MF local interconnection trunks is straightforward, as demonstrated by documentation contained in Telcordia's engineering "Blue Book" (an excerpt of which I have attached). Telcordia's Notes On The Network SR-2275, Issue 4, October 2000 (the latest issue) provides:

Customer dials (10XXXX) + (0/1) + (NPA) + NXX + additional 4 digits

1. EAEO seize signal to AT
2. Wink back from AT to EAEO
3. Originating EAEO send KP + 0ZZ + XXXX + ST to AT [XXXX=CAC]
4. AT seize to interconnecting carrier
5. Wink back from interconnecting carrier to AT (timed)
6. Wink from AT to EAEO (timed)
7. KP + II + ANI + ST or KP – ST from EAEO to interconnecting carrier

After Customer has Completed Dialing XXXX (the last 4 digits)

8. KP + (0) + 7/10Digits + ST from EAEO to interconnecting carrier
9. Acknowledge Wink from interconnecting carrier to AT (not timed in AT)
10. Acknowledge Wink from AT to EAEO (not timed in AT)
11. Answer Supervision (optional) from interconnecting carrier to AT
12. Answer Supervision (optional) from AT to EAEO

AT=Access Tandem
EAEO=Equal Access End office
ST=Start signal
Wink= "change in signal state of about 100ms – hook flash"
KP=Key pulse signal
0ZZ=spare tandem center code for administration – 4 maximum
II=information digits (*i.e.*, coin call, etc.)
CAC=Carrier Access Code

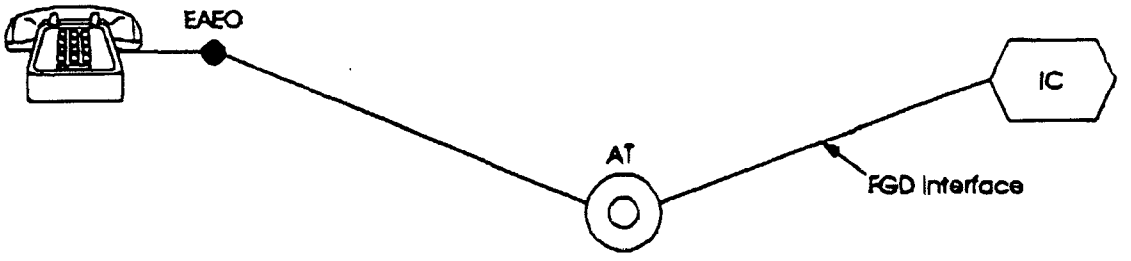
Critical to this example is the line immediately preceding step "1" above. Telcordia uses "( )" to demonstrate fields that are optional for routing. The EAEO/AT switching systems can perform equal access signaling with or without the "1" or "0" prefix optional digit, and then record and forward the ANI in an MF signaling environment over local interconnection trunks. Thus, Verizon's stated claim that it is not technically feasibile to do so is incorrect.

9. Verizon may have other unstated reasons for not wanting to pass ANI over local interconnection trunks, but I can only respond to the statements have made in there filings in this proceeding do date.

I declare under the laws of the United States that the statements presented herein are true and correct.

Robert A. Hart IV, P.E.

March 11, 2003



After Customer Dials (10XXX) + (0/1) + (NPA) + NXX

1. Seize →
2. ← Wink
3. KP + 0ZZ + XXX + ST →
4. Seize →
5. ← Wink
6. ← Wink
7. KP + II + ANI + ST or KP - ST →

After Customer has Completed Dialing XXXX

8. KP + (0) + 7/10D + ST →
9. ← Acknowledge Wink
10. ← Acknowledge Wink
11. ← Answer Supervision †
12. ← Answer Supervision †

* This wink is timed in tandem for both time of arrival and length of wink to end office.
** This wink is not timed in tandem.
† True answer supervision may or may not be provided.

Figure 6-52. Originating Signaling Sequence — Via Access Tandem — FGD